

# **MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY**

**TFC Canopy, Inc.  
1107 North Taylor Road  
Garrett, IN 46738-1880**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

|  |                                  |
|--|----------------------------------|
| Operation Permit No.: 033-14578-00061  |                                  |
| Original signed by Paul Dubenetzky<br>Issued by:<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: November 20, 2001 |

## TABLE OF CONTENTS

|            |   |           |
|------------|---|-----------|
| <b>A</b>   | <b>SOURCE SUMMARY</b> .....   | <b>4</b>  |
| A.1        | General Information   |           |
| A.2        | Emission Units and Pollution Control Equipment Summary                          |           |
| <b>B</b>   | <b>GENERAL CONDITIONS</b> .....   | <b>5</b>  |
| B.1        | Permit No Defense [IC 13]   |           |
| B.2        | Definitions   |           |
| B.3        | Effective Date of the Permit [IC13-15-5-3]                                      |           |
| B.4        | PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]                            |           |
| B.5        | Preventive Maintenance Plan [326 IAC 1-6-3]                                     |           |
| B.6        | Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]                       |           |
| B.7        | Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]         |           |
| B.8        | Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]                      |           |
| B.9        | Permit Revocation [326 IAC 2-1-9]   |           |
| <b>C</b>   | <b>SOURCE OPERATION CONDITIONS</b> .....  | <b>8</b>  |
|            | <b>Emission Limitations and Standards</b>                                       |           |
| C.1        | Opacity [326 IAC 5-1]   |           |
|            | <b>Testing Requirements</b>   |           |
| C.2        | Performance Testing [326 IAC 3-6]   |           |
|            | <b>Compliance Monitoring Requirements</b>                                       |           |
| C.3        | Compliance Monitoring [326 IAC 2-1.1-11]  |           |
| C.4        | Monitoring Methods [326 IAC 3]  |           |
| C.5        | Actions Related to Noncompliance Demonstrated by a Stack Test                   |           |
|            | <b>Record Keeping and Reporting Requirements</b>                                |           |
| C.6        | Malfunctions Report [326 IAC 1-6-2]   |           |
| C.7        | Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]                  |           |
| C.8        | General Record Keeping Requirements [326 IAC 2-6.1-2]                           |           |
| C.9        | Annual Notification [326 IAC 2-6.1-5(a)(5)]                                     |           |
| <b>D.1</b> | <b>FACILITY OPERATION CONDITIONS - Spray Paint Booth</b> .....                  | <b>12</b> |
|            | <b>Emission Limitations and Standards</b>                                       |           |
| D.1.1      | Miscellaneous Metal Coating Operations (VOC) [326 IAC 8-2-9]                    |           |
| D.1.2      | Particulate Matter (PM) [326 IAC 6-3-2(c)]                                      |           |
|            | <b>Compliance Determination Requirements</b>                                    |           |
| D.1.3      | Testing Requirements  |           |
| D.1.4      | Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)(A)] [326 IAC 8-1-2(a)(7)] |           |
|            | <b>Compliance Monitoring Requirements</b>                                       |           |
| D.1.5      | Monitoring  |           |
|            | <b>Record Keeping and Reporting Requirements</b>                                |           |
| D.1.6      | Record Keeping Requirements   |           |
| D.1.7      | Reporting Requirements  |           |

**D.2 FACILITY OPERATION CONDITIONS - small parts painting utilizing spray cans . . . . . 14**

**Emission Limitations and Standards**

D.2.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

**Compliance Determination Requirements**

D.2.3 Testing Requirements

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)(A)] [326 IAC 8-1-2(a)(7)]

**Compliance Monitoring Requirements**

D.2.5 Monitoring

**Record Keeping and Reporting Requirements**

D.2.6 Record Keeping Requirements

D.2.7 Reporting Requirements

**D.3 FACILITY OPERATION CONDITIONS - space heater, welding and flame cutting . . . . . 16**

**Emission Limitations and Standards**

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

**Compliance Determination Requirements**

D.3.2 Testing Requirements

**Compliance Monitoring Requirements**

D.3.3 Monitoring

**Record Keeping and Reporting Requirements**

D.3.4 Record Keeping Requirements

D.3.5 Reporting Requirements

|                                      |           |
|--------------------------------------|-----------|
| <b>CERTIFICATION . . . . .</b>       | <b>17</b> |
| <b>ANNUAL NOTIFICATION . . . . .</b> | <b>18</b> |
| <b>MALFUNCTION REPORT . . . . .</b>  | <b>19</b> |

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information

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The Permittee owns and operates a canopy manufacturing plant.

|                       |   |
|-----------------------|---|
| Responsible Official: | Gary D. Henderson   |
| Source Address:       | 1107 North Taylor Road, Garrett, IN 46738-1880  |
| Mailing Address:      | 1107 North Taylor Road, Garrett, IN 46738-1880  |
| Phone Number:         | 219-357-6665  |
| SIC Code:             | 3444  |
| County Location:      | DeKalb  |
| County Status:        | Attainment for all criteria pollutants.   |
| Source Status:        | Minor Source Operating Permit.<br>Minor Source, under PSD Rules.<br>Minor Source, under Section 112 of the Clean Air Act. |

### A.2 Emissions Units and Pollution Control Equipment Summary

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This source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) paint spray booth, used for coating fabricated metal.
- (b) One (1) miscellaneous small parts painting operation, utilizing spray cans for application.
- (c) One (1) hot melt lamination area, utilizing glue containing no volatile organic compounds (VOC).
- (d) One (1) natural gas-fired thermal economizer space heater rated at 4.06 million Btu per hour.
- (e) Four (4) metal inert gas (MIG) welding stations, and
- (f) One (1) oxyacetylene flame-cutting area.

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a permit under 326 IAC 2-6.1.

### B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### B.4 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year of any regulated pollutant from this source shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, 25 tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

### B.5 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMPs shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

**B.6 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.7 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.8 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**B.9 Permit Revocation [326 IAC 2-1-9]**

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Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes, in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2.

## SECTION C

## SOURCE OPERATION CONDITIONS

|               |
|---------------|
| Entire Source |
|---------------|

### Emission Limitations and Standards

#### C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### Testing Requirements

#### C.2 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.



## Compliance Monitoring Requirements

### C.3 Compliance Monitoring [326 IAC 2-1.1-11]

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### C.4 Monitoring Methods [326 IAC 3]

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

### C.5 Actions Related to Noncompliance Demonstrated by a Stack Test

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

## Record Keeping and Reporting Requirements

### C.6 Malfunctions Report [326 IAC 1-6-2]

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.7 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, such reasons must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.8 General Record Keeping Requirements [326 IAC 2-6.1-2]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Data Section, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

One (1) paint spray booth, used for coating fabricated metal.

### Emission Limitations and Standards

#### D.1.1 Miscellaneous Metal Coating Operations (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator shall be limited to 3.5. pounds of VOC per gallon of coating less water for extreme performance coatings.
- (b) Solvent used for paint lines during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

#### D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, is required for this facility.

### Compliance Determination Requirements

#### D.1.4 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)(A)] [326 IAC 8-1-2(a)(7)]

Compliance with the VOC content limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### Compliance Monitoring Requirements

#### D.1.6 Monitoring

Monthly inspections shall be performed of the coating emissions from the facility and the presence of overspray on the rooftops and the nearby ground.

## **Record Keeping and Reporting Requirements**

### **D.1.7 Record Keeping Requirements**

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- (a) To document compliance with D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records shall be made monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established:
  - (1) The quantity and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The total VOC usage for each month;
  - (3) The weight of VOC emitted for each compliance period.
- (b) To document compliance with D.1.6, the Permittee shall maintain a log of overspray observations.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.8 Reporting Requirements**

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There are no specific reporting requirements for this facility.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

One (1) miscellaneous small parts painting operation, utilizing spray cans for application.

### Emission Limitations and Standards

#### D.2.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

Any change or modification which would increase the actual VOC emissions from this facility to fifteen (15) pounds per day or more shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-2-9.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

### Compliance Determination Requirements

#### D.2.3 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)(A)] [326 IAC 8-1-2(a)(7)]

Compliance with the VOC content limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### Compliance Monitoring Requirements

#### D.2.5 Monitoring

Monthly inspections shall be performed of the coating emissions from the facility and the presence of overspray on the rooftops and the nearby ground.

### Record Keeping and Reporting Requirements

#### D.2.6 Record Keeping Requirements

- (a) To document compliance with D.2.1, the Permittee shall maintain records of the quantity and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Records shall be made monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.7 Reporting Requirements

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There are no specific reporting requirements for this facility.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) natural gas-fired thermal economizer space heater rated at 4.06 million Btu per hour.
- (b) Four (4) metal inert gas (MIG) welding stations, and
- (c) One (1) oxyacetylene flame-cutting area.

## Emission Limitations and Standards

### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions from welding and flame cutting operations shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

## Compliance Determination Requirements

### D.3.2 Testing Requirements

The Permittee is not required to test this facility by this permit.

## Compliance Monitoring Requirements

### D.3.3 Monitoring

There are no specific monitoring requirements for this facility.

## Record Keeping and Reporting Requirements

### D.3.4 Record Keeping Requirements

There are no specific record keeping requirements for this facility.

### D.3.5 Reporting Requirements

There are no specific reporting requirements for this facility.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT  
CERTIFICATION**

Source Name: TFC Canopy, Inc.  
Source Address: 1107 North Taylor Road, Garrett, IN 46738-1880  
Mailing Address: 1107 North Taylor Road, Garrett, IN 46738-1880  
Part 70 Permit No.: 033-14578-00061

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Notification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

|                      |                               |
|----------------------|-------------------------------|
| <b>Company Name:</b> | <b>TFC Canopy, Inc.</b>       |
| <b>Address:</b>      | <b>1107 North Taylor Road</b> |
| <b>City:</b>         | <b>Garrett, IN 46738-1880</b> |
| <b>Phone #:</b>      | <b>219-357-6665</b>           |
| <b>MSOP #:</b>       | <b>033-14578-00061</b>        |

I hereby certify that TFC Canopy, Inc. is:

☒ still in operation.      ☐ no longer in operation.

I hereby certify that TFC Canopy, Inc. is:

☒ in compliance with the requirements of MSOP 033-14578-00061.

☐ not in compliance with the requirements of MSOP 033-14578-00061.

|                                       |
|---------------------------------------|
| <b>Authorized Individual (typed):</b> |
| <b>Title:</b>                         |
| <b>Signature:</b>                     |
| <b>Date:</b>                          |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

|                       |
|-----------------------|
| <b>Noncompliance:</b> |
|                       |
|                       |
|                       |
|                       |
|                       |
|                       |

## **MALFUNCTION REPORT**

### **INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT  
25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_,  
25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_,  
25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_,  
25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_,  
100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_,  
10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT?\_\_\_\_\_,  
25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_,  
1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR  
IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_.  
EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN  
EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR  
PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y       N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y       N

COMPANY:        TFC Canopy, Inc.    PHONE NO. (       ) \_\_\_\_\_

LOCATION: (CITY AND COUNTY)        1107 North Taylor Road, Garrett, IN 46738-1880 (DeKalb County)

PERMIT NO. 033-14578-00061

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/19\_\_\_\_        AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/19\_\_\_\_        AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO<sub>2</sub>, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

**Please note - This form should only be used to report malfunctions  
applicable to Rule 326 IAC 1-6 and to qualify for  
the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**Indiana Department of Environmental Management  
Office of Air Quality**

**Addendum to the Technical Support Document (TSD) for a  
Minor Source Operating Permit (MSOP)**

**Source Background and Description**

|  |   |
|--|---|
| <b>Source Name:</b>                    | <b>TFC Canopy, Inc.</b>                               |
| <b>Source Location:</b>                | <b>1107 North Taylor Road, Garrett, IN 46738-1880</b> |
| <b>County:</b>                         | <b>DeKalb</b>   |
| <b>SIC Code:</b>                       | <b>3444</b>   |
| <b>Operation Permit No.:</b>           | <b>033-5717-00061</b>                                 |
| <b>Operation Permit Issuance Date:</b> | <b>September 6, 1996</b>                              |
| <b>Revision No.:</b>                   | <b>033-14578-00061</b>                                |
| <b>Permit Reviewer:</b>                | <b>Allen R. Davidson</b>                              |

On September 27, 2001, the Office of Air Quality (OAQ) had a notice published in the *Auburn Evening Star* stating that TFC Canopy, Inc. had applied for a Minor Source Operating Permit (MSOP) to operate a canopy manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Gary D. Henderson of TFC Canopy, Inc. submitted comments on the proposed permit. The comments and responses to the comments, are as follows:

**Comment 1a:**

We do not agree that [Condition B.5 Preventive Maintenance Plan] is appropriate. TFC Canopy does not operate emission control equipment. Accordingly, a preventative maintenance plan for pollution control equipment is not applicable.

**Comment 1b:**

As stated previously, we do not believe that [Condition D.1.3 Preventive Maintenance Plan] is applicable.

**Response 1:**

The requirement to maintain a Preventive Maintenance Plan is applicable to any owner or operator of a facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1. Since the paint booth has the potential to emit VOC greater than the thresholds in 326 IAC 2-6.1, the rule is applicable to the paint booth regardless of the presence or absence of external control devices.

Any preventive maintenance that could affect emissions from the facilities in question should be listed in the Preventive Maintenance Plan. For example: air baffles and water curtains would require preventive maintenance periodically to insure that they continue to function properly. There will be no change in Condition B.5 or D.1.3. However, OAQ acknowledges that information requested in 326 IAC 1-6-3(a)(1) would not be applicable in the case of facilities without any emission control devices.

**Comment 2:**

We believe that [Item C.9 General Requirements] is generic and should not apply to this facility. Since emission control equipment is not present at this facility, the requirement to submit compliance monitoring reports appears to be excessive and unduly burdensome. This section appears to conflict with Section D.3.5, which states that no specific reporting requirements apply to the facility.

**Response 2:**

Rule 326 IAC 2-1.1-11 grants OAQ the authority to require stack testing, monitoring or reporting "at any time to assure compliance with all applicable requirements." OAQ has reevaluated this emission source and determined that the reporting requirements in Section C - Annual Notification will be satisfactory for this emission source. Condition C.9 has been removed from the permit.

~~C.9 — General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

- ~~(a) — To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(b) — The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015~~
- ~~(c) — Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- ~~(d) — Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period. Such reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(e) — All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - ~~(1) — An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
  - ~~(2) — A malfunction as described in 326 IAC 1-6-2; or~~
  - ~~(3) — Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
  - ~~(4) — Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~~~

- 
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- 
- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- 
- ~~(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.~~

In addition, the Quarterly Compliance Monitoring Report has been removed from the permit.

**Comment 3:**

We feel that weekly [overspray] inspections are excessive, given that this facility is a minor source. We propose quarterly inspections.

**Response 3:**

Evidence of overspray deposition strongly implies increased particulate matter emissions into the air. OAQ believes that quarterly inspections are inadequate for detecting overspray problems and correcting them in a timely manner. OAQ requires emission sources to perform monthly overspray inspections when no control device is required for compliance with 326 IAC 6-3-2, and weekly inspections when a control device is required. Condition D.1.6 has been amended to read as follows:

**D.1.6 Monitoring**

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~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the facility and the presence of overspray on the rooftops and the nearby ground. ~~The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.~~

Also Condition D.2.5 has been amended to read as follows:

**D.2.5 Monitoring**

---

~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the facility and the presence of overspray on the rooftops and the nearby ground.

**Comment 4:**

We believe that the record keeping requirements of [Condition D.1.7] are excessive, and appears to be in conflict with provision D.3.4, which states that no specific reporting requirements exist for the facility.

**Response 4:**

The two conditions D.1.7 and D.3.4 are applicable to different emission units at the plant. Condition D.1.7 is only applicable to the emission unit listed in the facility description box at the beginning of Section D.1. Condition D.3.4 is only applicable to the emission units in the facility description box at the beginning of Section D.3.

The record keeping requirements of Condition D.1.7(a) are necessary for two reasons: to ensure that the plant's coatings comply with 326 IAC 8-2-9, and to ensure that the plant does not become subject to 326 IAC 2-7 or 326 IAC 2-8 before receiving a permit pursuant to those rules. OAQ does not believe the record keeping requirements are unreasonable. OAQ expects the following:

1. Monthly coating and solvent usage can be derived by examining the company's purchase records and inventory records. For example: if TFC Canopy had 350 gallons of Red Oxide Primer in inventory on September 1, bought 1500 gallons in the month of September, and had 200 gallons of Red Oxide Primer in inventory on October 1, then usage of Red Oxide Primer in September was 1650 gallons (350 gal +1500 gal -200 gal ). If inventory is not taken on the first or the end of the month, usage may be allocated between the two months based on either a ratio of calendar days or a ratio of work days.
2. The VOC content of each coating is available on material safety data sheets (MSDS) available from the coating manufacturer. VOC content of each coating is not expected to change significantly from month to month if the same manufacturer is used, so the acquisition of MSDS needs to be done only once per coating. TFC Canopy has already collected the MSDS from one manufacturer for the primer listed in the application.
3. The monthly VOC usage for each coating or solvent can be calculated by multiplying the gallons used per month by the VOC content. For example, if TFC Canopy used 1650 gallons of Red Oxide Primer in September and the VOC content is 3.37 pounds of VOC per gallon of coating, then VOC usage from the primer would be 5568 pounds for September (1650 gal \* 3.37 lb VOC/gal).
4. TFC Canopy may deduct the amount of coating or solvent that it has collected as waste solvent while complying with 326 IAC 8-2-9. For example: if 20 pounds of wasted primer were sprayed into containers and shipped offsite for disposal in September, then TFC Canopy may deduct approximately six pounds (20 lb primer \* (3.37 lb VOC / gal primer) / (11.75 lb / gal primer) = 6.05 lb VOC) from the monthly VOC usage, and list the result as VOC emitted. If TFC Canopy does not wish to calculate this deduction, then VOC emitted would be considered the same as VOC usage.

Condition D.1.7 has been amended to read as follows:

#### D.1.7 Record Keeping Requirements

- (a) To document compliance with D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records shall be made monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established:
  - (1) The quantity and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The total VOC usage for each month;
  - (3) The weight of VOC emitted for each compliance period.
- (b) To document compliance with D.1.6, the Permittee shall maintain a log of overspray observations ~~and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Minor Source Operating Permit**

#### **Source Background and Description**

|  |   |
|--|---|
| <b>Source Name:</b>                    | <b>TFC Canopy, Inc.</b>                               |
| <b>Source Location:</b>                | <b>1107 North Taylor Road, Garrett, IN 46738-1880</b> |
| <b>County:</b>                         | <b>DeKalb</b>   |
| <b>SIC Code:</b>                       | <b>3444</b>   |
| <b>Operation Permit No.:</b>           | <b>033-5717-00061</b>                                 |
| <b>Operation Permit Issuance Date:</b> | <b>September 6, 1996</b>                              |
| <b>Application No.:</b>                | <b>033-14578-00061</b>                                |
| <b>Permit Reviewer:</b>                | <b>Allen R. Davidson</b>                              |

On June 22, 2001, the Office of Air Quality (OAQ) received an application from TFC Canopy, Inc. relating to the operation of the following equipment:

- (a) One (1) paint spray booth, used for coating fabricated metal.
- (b) One (1) miscellaneous small parts painting operation, utilizing spray cans for application.
- (c) One (1) hot melt lamination area, utilizing glue containing no volatile organic compounds (VOC).
- (d) One (1) natural gas-fired thermal economizer space heater rated at 4.06 million Btu per hour.
- (e) Four (4) metal inert gas (MIG) welding stations, and
- (f) One (1) oxyacetylene flame-cutting area.

#### **History**

TFC Canopy, Inc. was issued a construction and operation permit for a canopy manufacturing plant on September 6, 1996. This application, submitted as an operation permit renewal, is the first since that date.

#### **Enforcement Issues**

There are no enforcement actions pending against this emission source.

#### **Stack Summary**

Stack information will not be changed as a result of this application.

#### **Recommendation**

The staff recommends to the Commissioner that the emission source be issued a Minor Source Operating Permit. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 22, 2001.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations. (2 pages)

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

| Pollutant       | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM              | 24.6                          |
| PM-10           | 24.6                          |
| SO <sub>2</sub> | 0                             |
| VOC             | 45.3                          |
| CO              | 1.5                           |
| NO <sub>x</sub> | 1.8                           |

| HAP's         | Potential To Emit (tons/year) |
|---------------|-------------------------------|
| Xylene        | 3.80                          |
| Ethylbenzene  | 0.73                          |
| Toluene       | 0.44                          |
| Glycol Ethers | 0.44                          |
| TOTAL         | 5.41                          |

The potential to emit volatile organic compounds (VOC) is less than 100 tons per year, but greater than 25 tons per year. Therefore, the existing source is classifiable as a minor source under 326 IAC 2-6.1.

This existing source is not a major source for Prevention of Significant Deterioration, 326 IAC 2-2. No attainment regulated pollutant has the potential to emit at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

## County Attainment Status

The source is located in DeKalb County.

| Pollutant       | Status     |
|-----------------|------------|
| PM-10           | attainment |
| SO <sub>2</sub> | attainment |
| NO <sub>2</sub> | attainment |
| Ozone           | attainment |
| CO              | attainment |
| Lead            | attainment |

DeKalb County has been classified as attainment or unclassifiable for all pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### **Federal Rule Applicability**

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)**

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source was existing as of July 27, 1997. Also, it does not have potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAPs.

#### **326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it does not have the potential to emit more than one hundred (100) tons per year of any pollutant specified in the rule.

#### **326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Paint Spray Booth**

#### **326 IAC 8-2-9 (Miscellaneous Metal Coating)**

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings. The products are used outdoors.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

#### **326 IAC 6-3-2 (Particulate Emissions Limitations)**

This emission unit is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

Control equipment is not required in order to comply with this limit. See Appendix A of this document for detailed emissions calculations. (2 pages)

#### **State Rule Applicability - Miscellaneous Small Parts Painting**

326 IAC 8-2-9 (Miscellaneous Metal Coating)

326 IAC 8-2-9 does not apply to this facility because actual VOC emissions are less than fifteen (15) pounds per day.

#### **State Rule Applicability - Hot Melt Lamination Area**

There are no state rules applicable to this facility.

#### **State Rule Applicability - Space Heater**

There are no state rules applicable to this facility.

#### **State Rule Applicability - Welding and Flame Cutting**

These operations are classifiable as an insignificant activity under 326 IAC 2-7-1(21). Particulate emissions are assumed to be negligible.

#### **Conclusion**

The operation of these facilities shall be subject to the conditions of the attached Minor Source Operating Permit, No. 033-14578-00061.

**Appendix A: Emissions Calculations**  
**VOC and Particulate**  
**From Surface Coating Operations**

**Company Name:** TFC Canopy, Inc.  
**Address City IN Zip:** 1107 North Taylor Road, Garrett, IN 46738-1880  
**ID:** 033-14578-00061  
**Reviewer:** Allen R. Davidson  
**Date:** 11/21/01

| Material            | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---------------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| <i>Paint Booth:</i> |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
| Red Oxide Primer    | 11.15            | 30.46%                             | 0.20%          | 30.26%            | 0.26%          | 46.87%                          | 2.64395                | 1.000               | 3.38  | 3.37                             | 8.92                          | 214.12                       | 39.08                       | 22.45                          | 7.20              | 75%                 |
| <i>Spray Cans:</i>  |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
| Acrylic White       | 9.76             | 42.10%                             | 0.00%          | 42.10%            | 0.00%          | 43.30%                          | 0.34221                | 1.000               | 4.11  | 4.11                             | 1.41                          | 33.75                        | 6.16                        | 2.12                           | 9.49              | 75%                 |
|                     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
|                     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
|                     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
|                     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
|                     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
|                     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
|                     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
|                     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |

**State Potential Emissions**

**Add worst case coating to all solvents**

**10.33**

**247.87**

**45.24**

**24.57**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

The following calculations determine the PM emission limit for spray painting under 326 IAC 6-3-2:

$$E = 4.1 * (2.2 ^{0.67}) = 6.85 \text{ lb/hr}$$

$$6.85 \text{ lb/hr} * 8760 \text{ hr/yr} / 2000 \text{ lb/ton} = 29.99 \text{ ton/yr} \quad (\text{will comply})$$

A control device is not required to comply with this limit.

The following calculations determine actual VOC usage by painting of miscellaneous parts using spray cans:

$$\frac{521 \text{ can}}{\text{month}} * \frac{12 \text{ fl oz}}{\text{can}} * \frac{\text{gal}}{128 \text{ fl oz}} * \frac{4.11 \text{ lb VOC}}{\text{gal}} * \frac{\text{month}}{30 \text{ day}} = 6.69 \text{ lb/day}$$

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

**Company Name:** TFC Canopy, Inc.  
**Address City IN Zip:** 1107 North Taylor Road, Garrett, IN 46738-1880  
**ID:** 033-14578-00061  
**Reviewer:** Allen R. Davidson  
**Date:** 11/21/01

| Material            | Density<br>(Lb/Gal) | Gallons<br>of<br>Material<br>(gal/unit) | Maximum<br>(unit/hour) | Weight %<br>HAP#1 | Weight %<br>HAP#2 | Weight %<br>HAP#3 | Weight %<br>HAP#4 | Weight %<br>HAP#5 | Weight %<br>HAP#6 | Weight %<br>HAP#7 | Emissions<br>HAP#1<br>(ton/yr) | Emissions<br>HAP#2<br>(ton/yr) | Emission<br>s HAP#3<br>(ton/yr) | Emissions<br>HAP#4<br>(ton/yr) | Emissions<br>HAP#5<br>(ton/yr) | Emissions<br>HAP#6<br>(ton/yr) | Emissions<br>HAP#7<br>(ton/yr) |
|---------------------|---------------------|---|------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|--------------------------------|--------------------------------|---------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|
| <i>Paint Booth:</i> |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |
| Red Oxide Primer    | 11.15               | 2.64395                                 | 1.00000                | 0.00%             | 0.00%             | 0.00%             | 0.00%             | 0.00%             | 0.00%             | 0.00%             | 0.00                           | 0.00                           | 0.00                            | 0.00                           | 0.00                           | 0.00                           | 0.00                           |
| <i>Spray Cans:</i>  |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |
| Acrylic White       | 9.76                | 0.34221                                 | 1.00000                | 26.00%            | 5.00%             | 3.00%             | 3.00%             | 0.00%             | 0.00%             | 0.00%             | 3.80                           | 0.73                           | 0.44                            | 0.44                           | 0.00                           | 0.00                           | 0.00                           |
|                     |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |
|                     |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |
|                     |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |
|                     |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |
|                     |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |
|                     |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |
|                     |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |
|                     |                     |   |                        |                   |                   |                   |                   |                   |                   |                   |                                |                                |                                 |                                |                                |                                |                                |

**Total State Potential Emissions:** 3.80      0.73      0.44      0.44      0.00      0.00      0.00  
Total State Potential Emissionsfor all HAP: 5.41

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**LEGEND**

HAP#1 = Xylene  
HAP#2 = Ethylbenzene  
HAP#3 = Toluene  
HAP#4 = Glycol Ethers  
HAP#5 = n/a  
HAP#6 = n/a  
HAP#7 = n/a